

FCC Appeal of USAC Decision
St Louis City School District – BEN 136902 – FY2015

October 18, 2017

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554 *(submitted electronically via ECFS)*

Appeal – CC Docket Nos. 96-45 and 02-6

USAC Appeal Decision Date: September 7, 2017

Form 471 Number: 954886

Funding Request Number (FRN): 2629546

Funding Year: 2014-2015

Billed Entity Name: St Louis City School District

BEN: 136902

Contact Information:

Contact Person Name:	Don Dietrich
Contact Person Phone:	314-378-1667
Contact Person Fax:	636-692-5958
Contact Person E-Mail:	ddietrich@e-rateprofessionals.com

Decision being appealed: USAC's Denial of our Appeal Dated August 25, 2017 – copy attached.

Text from USAC Denial Letter (SLD Denial Letter is included as Att 1)

"Our records show that your appeal was postmarked more than 60 days after the date your Remittance Statement was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.."

Background:

We understand that our appeal was filed a few days late but we are asking for a waiver based on our circumstances. This appeal is for SLD's non-payment of an invoice that we have submitted multiple times. All of the details are in the attached Appeal but the summary is that SLD invoice processing continues to short-pay the invoice on what we believe are technicalities. The invoice is for cellular voice services for our district for an entire year. The amount in dispute is almost \$159k and represents a serious financial risk for the district. We are asking for a waiver to re-submit this invoice for processing one last time.

Summary and Requested Action: We are presenting no new evidence here – we are simply escalating our original appeal to the FCC for reconsideration. We appreciate your time and consideration.

FCC Appeal of USAC Decision
St Louis City School District – BEN 136902 – FY2015

Sincerely,

(filed electronically via SLD website)

Don Dietrich, E-Rate Consultant to SLPS

Telephone: 314-378-1667

ddietrich@e-rateprofessionals.com

Included below:

Att 1: USAC's Denial of SLPS Appeal dated September 7, 2017

Att 2: SLPS's USAC Appeal dated August 25, 2017

Including all attachments below:

Att 1: Signed LOA for BTU Consultants

Att 2: Email chain between SLD and SLPS

(submitted electronically via ECFS)



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2014-2015

September 07, 2017

Don Dietrich
St Louis City School District
801 North 11th Street
Saint Louis, MO 63101-1401

Re: Applicant Name: ST LOUIS CITY SCHOOL DISTRICT
Billed Entity Number: 136902
Form 471 Application Number: 954886
Funding Request Number(s): 2629546
Decision Letter Date: June 22, 2017
Date Appeal Postmarked: August 25, 2017
Your Correspondence Dated: August 25, 2017

Our records show that your appeal was postmarked more than 60 days after the date your Remittance Statement was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

If you believe there is a basis for further examination of your application, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be postmarked within 60 days of the above date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

Schools and Libraries Division
Universal Service Administrative Company

USAC / SLD Appeal
St Louis City School Dist - BEN 136902

August 25, 2017

SLD Appeals – *Submitted Online*

Schools and Libraries Division — Correspondence Unit

100 South Jefferson Road, P.O. Box 902, Whippany, New Jersey 07981

Re: Letter of Appeal – *(filed electronically)*

Contact Information:

Contact Person Name:	Don Dietrich
Contact Person Phone:	314-378-1667
Contact Person Fax:	636-692-5958
Contact Person E-Mail:	ddietrich@e-rateprofessionals.com

Other Required Information:

Funding Year:	2014
Applicant Name:	St Louis City School District
Billed Entity # :	136902
Form 471 Application#:	954886
FRN #	2629546
Service Provider Name	AT&T Mobility
Service Provider SPIN:	143025240

SLD action being appealed

We are appealing the denial of a SPI (Service Provider Invoice) by SLD that we were made aware of on June 27, 2017 (see ATT 2). We are requesting that SLD re-examine this invoice and approve payment or at the very least grant us an additional Invoice Deadline Extension in order for the invoice to be re-examined. The invoice covers the district's cellular phone usage for the entire 2014 Funding Year. Details are shown below:

<i>Original Invoice Date:</i>	<i>Unknown</i>
<i>SLD Invoice Number:</i>	<i>2567700</i>
<i>Amount Requested on SPI:</i>	<i>\$158,978.80</i>
<i>Amount Paid by SLD:</i>	<i>\$0.00</i>
<i>Reason for Short Payment:</i>	<i>"we could not verify the applicant payments covered the \$86,017.09 of ineligible charges"</i>

Background and basis for this appeal

This is our third appeal regarding this FRN. An invoice from our SP was originally short paid back in February of 2016 and we filed and won an appeal to gain an invoice extension. The invoice was again submitted by our SP in August of 2016 and in January of 2017 we received word that it was denied again for the same reason. Because the 'Last Date to Invoice' had passed, we appealed again and the SP re-invoiced only to be rejected for a different reason shown above and in the attached email.

USAC / SLD Appeal
St Louis City School Dist - BEN 136902

Details and Requested Action:

We received an email request for additional information (Service Cert) from our service provider and we sent the signed Service Cert and all requested payment information to SLD (Brandon Pasanen) on June 7, 2017 (see Att 2). Following this certification, we received an additional request to provide information and we did. On June 27, 2017 we were informed by our SP that the invoice had been denied. The reason given is that we (the district) did not pay the ineligible portion of the charges. We disputed this and provided proof that our payment was covered by credits from previous invoices. This exchange is documented in Att 2.

The Last Date to Invoice has (again) passed and in discussions with our SP they are not going to re-invoice and they are not going to request an additional extension and they are not going to appeal. This chain of events is unfair to SLPS because we paid our share of the invoices and we supplied all of the required documentation prior to the invoicing deadline. The impact of this short-pay is approximately \$158k that the district will have to pay out of pocket.

We are requesting a re-opening of the denied invoice and a re-examination of the payment decision. This is for FY2014 funding – we have been working to get this payment to our service provider for over three years.

We are requesting that SLD either re-evaluate the invoice or grant us an extension of time for the SP to re-file. (The SP is aware of our efforts in this matter and will re-invoice if required.)

Sincerely,
(filed electronically via SLD website)
Don Dietrich
E-Rate Consultant to SLPS
Telephone: 314-378-1667
ddietrich@e-rateprofessionals.com

Included below:

Att 1: LOA for BTU Consultants – consultant assisting with appeal process
Att 2: Emails to / from Brandon Pasanen (SLD Reviewer)

Appeal Att 1 - Signed LOA

E-Rate LOA (Letter of Agency)

To Whom It May Concern:

We have retained BTU Consultants, LLC under contract as Independent Consultants to serve as our agent for working with E-Rate issues for **Funding Year 2017 and all prior years** in all areas of Telecommunications, Internet Services and Internal Connections. They will be assisting us in compliance issues and forms preparation. Their contact information is shown below:

BTU Consultants, LLC (Don Dietrich, Lori Thompson, Carol Underriner)		
SLD Consultant Registration Number: 16049611		
4 Media Court	or	1293 Pinehurst Club Ct
St. Louis, MO 63146		O Fallon, MO 63366
Phone: 314-983-0292		Phone: 636-294-7117
Fax: 314-983-0415		Fax: 636-294-2188

Please accept their comments, statements and signatures on our behalf.

This LOA is in effect from signing through 9/30/2017.

Thank you.

Signature of District Authority: 

Date: 10/01/2016

Printed Name / Title: Cheryl L. VanNoy, Executive Director—Information Technology

School District Name: St. Louis City School District

Billed Entity Number: 136902

cc: BTU Consultants, LLC

Don Dietrich

From: Pasanen, Brandon <Brandon.Pasanen@sl.universalservice.org>
Sent: Tuesday, June 27, 2017 1:00 PM
To: Don Dietrich
Subject: RE: SLD invoice 2567700 **Reply by 6/21/17**

Don Dietrich,

This invoice was rejected because we could not verify that the applicant had paid the full cost of the ineligible charges. The service provider's worksheet indicated \$86,017.09 of ineligible charges removed for the requested months of July to December of 2014.

For payment verification we **must confirm that the applicant has paid the full cost of ineligible charges** plus their discounted portion of eligible charges.

Based on the payment documentation provided, we could not verify the applicant payments covered the \$86,017.09 of ineligible charges. Therefore the invoice was rejected.

At this time there is nothing further I can do to change the outcome of this review.

Please contact USAC client services for further guidance should you wish to file an appeal or resubmit.

Their phone# is 888-203-8100

Their alternate modes of contact can be found here: <http://www.usac.org/about/tools/contact/default.aspx>

Thank you for your cooperation and continued support of the Universal Service Program.

Brandon Pasanen
Case Management, Invoicing Team, Schools and Libraries Program
30 Lanidex Plaza West | Parsippany, NJ 07054
T: 973-581-7570 | F: 973-599-6539
Brandon.pasanen@sl.universalservice.org

From: Don Dietrich [mailto:ddietrich@e-rateprofessionals.com]
Sent: Tuesday, June 27, 2017 1:49 PM
To: Pasanen, Brandon
Cc: 'GINA M WILLIAMS'; 'Cheryl L. VanNoy'; 'Wantz, Mary'
Subject: RE: SLD invoice 2567700 **Reply by 6/21/17**

Brandon,

Our service provider just informed me that the invoice was rejected.

We have been working on this for a LONG time to satisfy the invoicing requirements and I really need to understand the reason for the denial.

I thought that we satisfied your questions below – but this invoice has been rejected multiple times and the 'Last Date to Invoice' has again passed.

Can you give me any additional information on this – and can you tell me if we have any alternative next steps other than another appeal.

Don Dietrich

From: Don Dietrich [<mailto:ddietrich@e-rateprofessionals.com>]
Sent: Monday, June 19, 2017 11:52 PM
To: 'Pasanen, Brandon' <Brandon.Pasanen@sl.universalservice.org>; 'NECOEMOBILITY@ATT.COM' <NECOEMOBILITY@ATT.COM>
Cc: 'GINA M WILLIAMS' <gw2451@att.com>; 'Cheryl L. VanNoy' <Cheryl.VanNoy@slps.org>; 'Wantz, Mary' <Mary.Wantz@slps.org>
Subject: RE: SLD invoice 2567700 **Reply by 6/21/17**

Brandon,

The credit stems from an SLD payment on the FRN for this account from FY2013 (FRN 2466252).

Attached is a copy of the June 2014 Invoice showing a credit of \$155,168.59 as well as other credits and costs. The resulting Credit Balance is \$117,586.43.

Please let us know if this answers your question and if you need any additional information.

Thanks
Don Dietrich

From: Pasanen, Brandon [<mailto:Brandon.Pasanen@sl.universalservice.org>]
Sent: Wednesday, June 14, 2017 11:48 AM
To: Don Dietrich <ddietrich@e-rateprofessionals.com>; NECOEMOBILITY@ATT.COM
Cc: GINA M WILLIAMS <gw2451@att.com>; Cheryl L. VanNoy <Cheryl.VanNoy@slps.org>; 'Wantz, Mary' <Mary.Wantz@slps.org>
Subject: SLD invoice 2567700 **Reply by 6/21/17**

NORA RAFFERTY—

SLD Invoice No	SP_App Invoice No	Line ID	Customer Billed Date	471	FRN	SPIN	Service Provider Name	Applicant Name	BEN	Unc
2567700	GW2451 STLOUIS 2629546	8554794	01-Jun-15	954886	2629546	143025240	AT&T Mobility	ST LOUIS CITY SCHOOL DISTRICT	136902	

The payment verification documentation provided by the applicant does not cover the total ineligible charges removed per the service provider's worksheet.

See the first attached worksheet for a reconciliation of applicant payments vs ineligible removed by the service provider.

Per program rules the applicant must pay their **discounted share for eligible charges** plus the **full ineligible charges** due.

The July 2014 bill indicates the applicant entered the billing period with an account balance credit of **\$117,586.43**. Therefore I must confirm this prior credit balance is E-Rate eligible in order to approve payment on this invoice request.

I require the prior bills resulting in this credit to validate eligibility of the requested credits:

- If the requested credits encompass 20 bills or less (sub-bills and sub accounts may contribute to this figure):

Please submit:

- I. A copy of the summary page/s for the bill/s sent to Applicant, to show:

- a. Bill Date,
- b. Service Provider Name,
- c. Bill-To Entity,
- d. Credit amount,
- e. Type of credit,

- If the requested credits encompass more than 20 bills (sub-bills and sub accounts may contribute to this figure):

Please only submit:

- I. A worksheet (sample attached) to summarize the bill/s (by month/ account number, as applicable) and to indicate:
 - a. Total credit amount per bill,
- II. The completed worksheet certification form (attached) to certify the accuracy of the worksheet.

Upon receipt of the worksheet by the SLP, you will be required to provide a sampling of bills (selected by SLP) to verify the worksheet.

- III. The bills sent to Applicant, to show:
 - a. Bill Date,
 - b. Service Provider Name,
 - c. Bill-To Entity,
 - d. Credit amount,
 - e. Type of credit,

Please provide this information to me as soon as possible within the next 7 calendar days, by End of Day Wednesday, 6/21/17. Failure to do so may result in a reduction or rejection of the invoice, without further request. In this event, please ensure you have all necessary documents collected before resubmitting your request. If you have any questions, please contact me within this 7 day period.

Thank you for your cooperation and continued support of the Universal Service Program.

Brandon Pasanen
Case Management, Invoicing Team, Schools and Libraries Program
 30 Lanidex Plaza West | Parsippany, NJ 07054
 T: 973-581-7570 | F: 973-599-6539
Brandon.pasanen@sl.universalservice.org

From: Don Dietrich [<mailto:ddietrich@e-rateprofessionals.com>]
Sent: Wednesday, June 07, 2017 11:59 AM
To: Pasanen, Brandon
Cc: GINA M WILLIAMS; NECOEMobility@att.com; Cheryl L. VanNoy; 'Wantz, Mary'
Subject: RE: SLD invoice 2567700 **Reply by 6/7/17**

Brandon,

Attached are the requested documents – described below. Per the original email that we rec'd from our Service Provider – we (SLPS) are providing the two items below (Svc Cert and Proof of Payment) and AT&T will be sending you the worksheets.

Also – I wanted to point out that this invoice is for Cellular for FY2014 and that it was denied twice in the past and we have appealed to SLD twice and won the right to re-submit both times. The invoice deadline won't allow us to re-submit again without another appeal, so while I believe that the attached files satisfy your request – please let me know if there are any questions that we can resolve without another denial. I believe

that the reason for previous denials is simply confusion about the district's required match. I hope the notes below convince you that we have satisfied that requirement.

Attached are:

1. Signed Service Cert
2. PDF file showing the full year's invoices and payments. The first page (snapshot below) of the file shows the check numbers, dates and amounts. Copies of checks and bank statements are also included. This invoice represents the full year of funding for the district.

AT&T CELLULAR PAYMENTS FOR FUND YEAR 2014 - 2015					
CHECK NUMBER	CHECK AMT.	DATE OF CHECK	MONTH / MONTHS PAID	AMOUNT PAID	Explanation
401516	\$6,283.63	9/30/2014	July - August, 2014	\$6,283.63	Paid ERATE Portion
402500	\$6,044.70	11/12/2014	August - September, 2014	\$6,044.70	Paid ERATE Portion
402968	\$6,113.17	12/2/2014	September - October, 2014	\$6,113.17	Paid ERATE Portion
403741	\$12,782.94	1/6/2015	October - November, 2014	\$6,385.03	Paid ERATE Portion
			November - December, 2014	\$6,397.91	Paid ERATE Portion
406579	\$12,507.04	2/19/2015	November - December, 2014	\$6,397.91	Paid Twice in Error
			December, 2014 - January, 2015	\$6,109.13	Paid ERATE Portion
407009	\$6,148.09	3/10/2015	January - February, 2015	\$6,148.09	Paid ERATE Portion
408172	\$4,505.02	4/21/2015	February - March, 2015	\$4,505.02	Paid ERATE Portion
408828	\$4,578.85	5/19/2015	March - April, 2015	\$4,578.85	Paid ERATE Portion
409753	\$4,599.19	6/23/2015	April - May, 2015	\$4,599.19	Paid ERATE Portion
409897	\$3,615.79	6/26/2015	May - June, 2015	\$3,615.79	Paid ERATE Portion
410435	\$2,958.58	8/11/2015	June - July, 2015	\$2,958.58	Paid ERATE Portion
			TOTAL PAID	\$70,137.00	

You can see from the notes on the invoices that SLPS calculated the district's matching amounts due each month as 14% of the total. This is because we were estimating the SLD discount rate at 86% - we realized that this was probably low but wanted to be on the safe side of paying 'our share' of the costs. **Also – this is for FY2014 before many of the restrictions/reductions in voice coverage were in place.** As you can also see from the file, SLPS paid over \$70k during the funding year – and this SPI is for approx. \$150k – so we believe that we have demonstrated that we paid more than our match.

3. A copy of Appeal decision from April 2017
4. A copy of Appeal decision from August 2016

Please let us know that you received and if there are any additional questions.

Thanks,
Don Dietrich
314-378-1667

From: Pasanen, Brandon [<mailto:Brandon.Pasanen@sl.universalservice.org>]
Sent: Wednesday, May 31, 2017 6:48 AM
To: Don Dietrich <ddietrich@e-rateprofessionals.com>
Subject: SLD invoice 2567700 **Reply by 6/7/17**

I will give you a 7 day extension to the original deadline.
I can grant no further extension beyond this date.

Please provide this information to me as soon as possible within the next 7 calendar days, by End of Day **Wednesday, 06/7/17**. Failure to do so may result in a reduction or rejection of the invoice, without further request. In this event,

please ensure you have all necessary documents collected before resubmitting your request. If you have any questions, please contact me within this 7 day period.

Thank you for your cooperation and continued support of the Universal Service Program.

Brandon Pasanen
Case Management, Invoicing Team, Schools and Libraries Program
30 Lanidex Plaza West | Parsippany, NJ 07054
T: 973-581-7570 | F: 973-599-6539
Brandon.pasanen@sl.universalservice.org

From: Don Dietrich [<mailto:ddietrich@e-rateprofessionals.com>]
Sent: Tuesday, May 30, 2017 8:58 PM
To: Pasanen, Brandon
Cc: 'WILLIAMS, GINA M'; NECOEMobility@att.com; Cheryl L. VanNoy
Subject: RE: St Louis City School District FY2014 FRN 2629546; SLD invoice 2567700 **Reply by 5/31/17**

Brandon,

I am requesting an extension to get this to you. This is an invoice that has been thru several reviews and for which we just won an appeal with SLD. I want to make sure that we are providing all of the requested information.

1. I will send you the signed service cert and I think from the notes below that ATT Mobility is sending you the requested spreadsheets.
2. I will also be sending you the proof of payment information

Please let us know that we can have an additional week.

Thanks
Don Dietrich

From: NECOE Mobility [<mailto:G02172@att.com>]
Sent: Wednesday, May 24, 2017 4:47 PM
To: Don at ERP (ddietrich@e-rateprofessionals.com) <ddietrich@e-rateprofessionals.com>
Cc: WILLIAMS, GINA M <gw2451@att.com>; NECOE Mobility <G02172@att.com>
Subject: FW: St Louis City School District FY2014 FRN 2629546; SLD invoice 2567700 **Reply by 5/31/17**
Importance: High

Don,

Please complete the service certification and payment verification per the attached email for FY2014 FRN 2629546 . The requested information should be sent to Brandon Pasanen of the SLD at Brandon.pasanen@sl.universalservice.org with a CC to NECOEMobility@att.com by 5/31/17. AT&T Mobility will care for the worksheet.

Thanks,

Jessica La Cavera
Senior Sourcing Specialist
Global Solutions & Sales Operations, Sales Enablement

AT&T

311 W. Washington St, Rm 16W21, Chicago, IL 60606

1-866-829-8184 necoemobility@att.com

MOBILIZING YOUR WORLD

From: Pasanen, Brandon [<mailto:Brandon.Pasanen@sl.universalservice.org>]

Sent: Wednesday, May 24, 2017 10:11 AM

To: NECOE Mobility <G02172@att.com>

Cc: NORA.RAFFERTY@1-866-830-8886 <IMCEAFAX-NORA+2ERAFFERTY+401-866-830-8886@solixinc.com>

Subject: SLD invoice 2567700 **Reply by 5/31/17**

NORA RAFFERTY—

SLD Invoice No	SP_App Invoice No	Line ID	Customer Billed Date	471	FRN	SPIN	Service Provider Name	Applicant Name	BEN	Un
2567700	GW2451 STLOUIS 2629546	8554794	01-Jun-15	954886	2629546	143025240	AT&T Mobility	ST LOUIS CITY SCHOOL DISTRICT	136902	

I am reviewing your request for reimbursement of the invoice line/s noted above.

BILLS:

Either A:

If the request for reimbursement for each FRN per Invoice is comprised of 20 bills or less (sub-bills and sub accounts may contribute to this figure):

Please submit:

- I. A copy of the summary page/s for the bill/s sent to Applicant, to show:
 - a. Bill Date,
 - b. Service Provider Name,
 - c. Bill-To Entity,
 - d. Current Charges,
 - e. Description of Products / Services Delivered,
 - f. Period of Service (for Digital Transmission and/or Internet Access),
 - g. Individual Call Detail NOT required (for phone bills).
- II. As guidance, a worksheet (sample attached) to summarize the bill/s (by month/ account number, as applicable) and to indicate:
 - a. Total current charge per bill,
 - b. Identification and removal of all ineligible products and services,
 - c. Calculation of the Undiscounted/Requested amounts.
- III. If any locations on the bills / worksheet are cross connect / meet points, please identify and state the Entity/s receiving the service.
- IV. If the invoice is for deposits or up-front charges for services, please include a copy of the full contract that supports those charges.

Or B:

If the request for reimbursement for each FRN per Invoice is comprised of more than 20 bills (sub-bills and sub accounts may contribute to this figure):

Please initially submit:

- I. Only a worksheet (sample attached) to summarize the bill/s (by month/ account number, as applicable) and to indicate:
 - a. Total current charge per bill,
 - b. Identification and removal of all ineligible products and services,
 - c. Calculation of the Undiscounted/Requested amounts.
- II. The completed worksheet certification form (attached) to certify the accuracy of the worksheet.
- III. If any locations on the bills / worksheet are cross connect / meet points, please identify and state the Entity/s receiving the service.
- IV. If the invoice is for deposits or up-front charges for services, please include a copy of the full contract that supports those charges.

Upon receipt of the worksheet by the SLP, you will be required to provide a sampling of bills (selected by SLP) to verify the worksheet.

- V. The bills sent to Applicant, to show:
 - a. Bill Date,
 - b. Service Provider Name,
 - c. Bill-To Entity,
 - d. Current Charges,
 - e. Description of Products / Services Delivered,
 - f. Period of Service (for Digital Transmission and/or Internet Access),
 - g. Individual Call Detail NOT required (for phone bills).

SERVICE CERTIFICATION:

Please also provide the attached Service Certification form, completed and certified by the authorized representative of the Applicant (school/library), for the products/services provided.

- I. The Representative/Contact Name, Title and Phone: the contact name should match as signatory. If the signatory is any other than the Representative/Contact Name identified on the form, please provide the full Name, Title and Phone Number of the signatory and a reason for the mismatch.
- II. Date Goods/Services Delivered: except for installation only invoice, required for all other products / services delivered;
- III. Date Goods/Services were or will be Installed: required only for non-recurring service (products that need installation);
 - a. This date is required regardless of party providing the installation.
- IV. Date Applicant Portion Paid and Check No., or Date to be Paid: required at all times.
- V. Certification box: select box either on the left or right side;
 - a. Left side: for services delivered/installed as on this invoice;
 - i. Based on service contracted for the FRN, please choose either Delivery Only or Delivery and Installation.
 - b. Right side: for services not yet delivered:
 - i. Please provide contract to indicate provision for up-front charges.
- VI. Signed and dated: by the authorized Applicant contact.

Please note: Service Certification forms are Invoice number specific. Due to audit requirements, the re-submittal of an earlier Service Certification form is not acceptable and will result in rejection of the current invoice line/s.

PAYMENT VERIFICATION:

Please answer the following questions and provide documentation, where needed::

1. Has any FRN listed above been approved for special construction charges where a Special Construction State/Tribal Match Percentage (State/Tribal funded %) plus Special Construction State/Tribal Match Discount Rate (E-rate funded %) equals 100% of the total pre-discount FRN charges?
Yes _____ No _____
2. If yes, please specify FRN(s) on this invoice that was funded 100% by State/Tribal and E-rate funds combined. No further documentation is required. _____
3. If no, please provide validation that the applicant portion of the payment has been paid for the invoice lines under review.
 - I. Payment by check: front and back of cancelled check required, showing bank validation of transaction being cleared.
 - a. If the check includes other payments, a distinct breakout must be received in order to validate payment for this particular invoice,
 - b. If your financial institution does not retain canceled checks as proof of payment, please provide documentation that show the Applicant making the payment and the Service Provider receiving it based on third party (i.e. bank) validation.
 - II. Other methods used for payment: documentation provided must clearly show the Applicant making the payment and the Service Provider receiving it based on third party (i.e. bank) validation.

RESPONSE REQUIREMENT:

Service Certification and Payment Verification documents sent to us directly by Applicants (school/library) with the SLP Invoice Number and the name/title/signature of the sender may help speed up the review process. Fax cover sheet must identify the organization.

Please provide this information to me as soon as possible within the next 7 calendar days, by End of Day Wednesday, 5/31/17. Failure to do so may result in a reduction or rejection of the invoice, without further request. In this event, please ensure you have all necessary documents collected before resubmitting your request. If you have any questions, please contact me within this 7 day period.

Thank you for your cooperation and continued support of the Universal Service Program.

Brandon Pasanen
Case Management, Invoicing Team, Schools and Libraries Program
 30 Lanidex Plaza West | Parsippany, NJ 07054
 T: 973-581-7570 | F: 973-599-6539
Brandon.pasanen@sl.universalservice.org

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